

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST LITIGATION
(NO. II)

Case No. 3:23-md-3071
MDL No. 3071

This Document Relates to:

3:22-cv-01082

3:23-cv-00326

3:23-cv-00330

3:23-cv-00339

3:23-cv-00345

3:23-cv-00357

3:23-cv-00358

3:23-cv-00377

3:23-cv-00378

3:23-cv-00379

3:23-cv-00380

3:23-cv-00381

3:23-cv-00390

3:23-cv-00391

3:23-cv-00410

3:23-cv-00411

3:23-cv-00414

3:23-cv-00415

3:23-cv-00440

3:23-cv-00445

3:23-cv-00552

UNOPPOSED MOTION TO DEEM CORTLAND MANAGEMENT, LLC
SUBSTITUTED FOR CORTLAND PARTNERS, LLC

Plaintiffs in certain matters transferred to this MDL originally named “Cortland Partners, LLC” as a Defendant. Counsel for that entity conferred with Plaintiffs’ Co-Lead Counsel, indicating that the correct Defendant was “Cortland Management, LLC.” Accordingly, in the Consolidated Amended Complaint (D.E. 291), Multi-Family Plaintiffs named Cortland Management, LLC as a Defendant (and, correspondingly, did not name Cortland Partners, LLC as a Defendant in the Complaint). The same was true for the First Amended Consolidated Class Action Complaint. (D.E. 314).

It has come to Plaintiffs’ attention that the pleadings in the underlying dockets in the above-captioned matters still list the original “Cortland” entity rather than the corrected one. As to the above-captioned matters, Plaintiffs therefore respectfully move the Court to (1) deem “Cortland Management, LLC” as substituted for “Cortland Partners, LLC” in each case; and (2) terminate Cortland Partners, LLC as a Defendant on each docket. Plaintiffs also submit that filing individual amended complaints in each of these actions would not be a good use of party or judicial resources. Accordingly, in the interests of conservation of resources and judicial economy, Plaintiffs respectfully request that the Court also defer the need for the Plaintiff in each of these matters to file an amended pleading reflecting this substitution until further order of the Court.

Co-Lead Counsel has conferred with counsel for the Cortland entities, who have indicated that they do not oppose the relief requested in this motion.

Dated: July 17, 2023

/s/ Tricia R. Herzfeld

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Plaintiffs' Steering Committee Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Tricia R. Herzfeld

Tricia R. Herzfeld